

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JENNAYA BENNETT-WERRA,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:20-cv-10017-ADB
	)	
STEVEN TOMPKINS, et al.,	)	
Defendants.	)	
	)	

**DEFENDANTS' MOTION TO DISMISS THE PLAINTIFF'S COMPLAINT**

Defendants Sheriff Steven Tompkins, Yolanda Smith, Zezinha Mitchell, Christina Ruccio and Jennifer Sullivan ("**Defendants**") respectfully request that this Court dismiss the Plaintiff's Complaint against them for failure to state a claim upon which relief can be granted pursuant to Fed.R.Civ.P. 12(b)(6). The Defendants rely upon the accompanying memorandum of law in support of their Motion.

Respectfully submitted,  
By Attorney,  
MAURA HEALEY  
ATTORNEY GENERAL  
Allen H. Forbes  
Special Assistant Attorney General

/s/ Melissa J. Garand  
Melissa J. Garand  
Assistant General Counsel  
BBO No. 554727  
Suffolk County Sheriff's Department  
200 Nashua Street  
Boston, MA 02114  
(617) 704-6680  
mgarand@scsdma.org

Date: June 30, 2020

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date. I also certify that on June 30, 2020, I sent a paper copy to the Plaintiff, Jennaya Bennett-Werra at the Suffolk County House of Correction, 20 Bradston Street, Boston, MA 02118.

/s/ Melissa J. Garand

Melissa J. Garand